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LANCE J. HENDRON, ESQ. 1 Nevada Bar No. 11151 2 625 S. Eighth Street Las Vegas, Nevada 89101 3 E-mail: lance@ghlawnv.com 4 5 6 7 UNITED STATES OF AMERICA, 8 Plaintiff, 9 VS. 10 JAELEAH MARIA GUIDA, and 11 LAURA VELREE GUIDA. 12 Defendants. 13 14 15 16 17

LANCE J. HENDŘON, ATTORNEY AT LAW, LLC Office: (702) 758-5858 • Facsimile: (702) 387-0034 Attorney for Defendant, Laura Velree Guida

## UNITED STATES DISTRICT COURT CLARK COUNTY, NEVADA

CASE No.: 2:18-mj-00955-NJK

STIPULATION TO CONTINUE PREMIMINARY HEARING (SECOND REQUEST)

IT IS HEREBY STIPULATED BY AND BETWEEN Defendant, Laura Velree Guida, through her counsel, Lance J. Hendron, Esq. of the law firm of Lance J. Hendron, Attorney at Law, LLC, Defendant, Jaeleah Maria Guida, through her counsel Adam Gill, Esq. of the law Firm of Aisen, Gill & Associates, LLP and Plaintiff, United States of America, through its counsel, Dayle Elieson, United States Attorney, Susan Cushman, Assistant United States Attorney, that the Preliminary Hearing in the above-captioned matter currently set for February 12, 2019 at 4:00 p.m. be continued to a date and time convenient to the Court, but no earlier than 45 days from the current setting.

This Stipulation is entered into for the following reasons:

1. Counsel for each defendant are requesting additional time and opportunity to review the discovery and discuss it with his respective client prior to preliminary hearing or indictment.

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- Defense counsel and counsel for the government agree to the continuance.
- 3. The defendants are not detained and agree to the continuance.
- Denial of this request for continuance could result in a miscarriage of justice.
- 5. The additional time requested by this Stipulation is excludable in computing the time from the filing of the criminal complain through which the government must assert an criminal Information or seek an Indictment by the Grand Jury pursuant to the Speedy Trial Act, Title 18, United States Code Section 3161(h)(7)(A), when considering the factors under Title 18, United States Code, Section 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

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6. This is the second request for a continuance.

DATED this 6th day of February 2019.

Respectfully Submitted,

<u>/s/ Lance Hendron</u>
Lance J. Hendron,
Attorney for Defendant, *Laura Guida* 

/s/ Adam Gill Adam Gill, Attorney for Defendant, Jaeleah Guida

/s/ Susan Cushman
Dayle Elieson,
United States Attorney
Susan Cushman,
Assistant United States Attorney

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LANCE J. HENDRON, ESQ. Nevada Bar No. 11151 LANCE J. HENDRON, ATTORNEY AT LAW, LLC 625 S. Eighth Street Las Vegas, Nevada 89101 Office: (702) 758-5858 • Facsimile: (702) 387-0034 E-mail: lance@ghlawnv.com Attorney for Defendant, Laura Velree Guida

## UNITED STATES DISTRICT COURT CLARK COUNTY, NEVADA

UNITED STATES OF AMERICA,

CASE No.: 2:18-mj-00955-NJK

Plaintiff,

VS.

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JAELEAH MARIA GUIDA, and LAURA VELREE GUIDA,

Defendant.

## FINDINGS OF FACTS

Based on the pending Stipulation of Counsel, and good cause appearing therefore, the Court finds that:

- 1. The period within which the government may assert an information or Seek an Indictment through the Grand Jury against the defendant is hereby extended from the date of filing of the complaint up through and including April 2, 2019.
- 2. Counsel for each defendant are requesting additional time and opportunity to review the discovery and discuss it with his respective client prior to preliminary hearing or indictment.
- 3. Both counsel for the defendants and counsel for the government agree to the continuance.
- 4. The defendants are not detained and agree to the continuance.

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ATTORNEY AT LAW, LLC

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5. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code Section 3161(h)(7)(A), when considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

6. This is the second request to continue the preliminary hearing.
For all the above-stated reasons, the end of justice would best be served by a continuance of preliminary hearing.

## ORDER

According, IT IS HEREBY ORDERED that the preliminary hearing currently scheduled for February 12, 2019 at 4:00 p.m. is continued to April 2, 2019, at 4:00 p.m., in Courtroom 3B.

DATED this \_\_\_\_\_ day of \_February\_\_\_\_, 2019.

UNITED STATES MAGISTRATE JUDGE